



April 29, 2016

Ms. Pamela Creedon
Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Dear Ms. Creedon,

The East San Joaquin Water Quality Coalition (ESJWQC) is requesting an extension of the submission of its analysis of the Nitrogen Management Plan (NMP) Summary Report data from May 1, 2016 to May 30, 2016. Originally targeted to be included in the Annual Report submitted May 1, 2016, the ESJWQC is requesting an additional 30 days to complete its analysis of the data. The ESJWQC will include a brief summary of the NMP Summary Report information in its May 1 Annual Report. NMP Summary Reports have been received for 72 different crops or crop categories (e.g. almonds/year 1, almonds/year 2, almonds/year 3, almonds/year 4, almonds/> year 4). Data to be included in the May 1 Annual Report include the reported acreage, minimum A/Y values, maximum A/Y values, the mean A/Y value and the median A/Y value for the various categories of crops.

The requirements in the Waste Discharge Requirements General Order R5-2012-0116 for Growers Within the Eastern San Joaquin River Watershed for Members of the Third-Party Group are that the summary of nitrogen management data must include:

- Comparisons of farms with the same crops, similar soil conditions, and similar practices (e.g. irrigation management)
- A statistical summary of nitrogen consumption ratios by crop or other equivalent reporting units and the estimated crop nitrogen needs for the different crop types and soil conditions that includes, at a minimum, the range, percentiles (10th, 25th, 50th, 75th, 90th) and any outliers
- Box and whisker plots or equivalent graphical or tabular presentation of the data
- A summary of nitrogen management data containing a quality assessment of the collected information by township (e.g. missing data, potentially incorrect/inaccurate reporting), a description of the corrective actions to be taken regarding deficiencies in the quality of the data submitted
- Submission of information in electronic format, compatible with ArcGIS, identifiable to the township level

In addition, the ESJWQC must report the ratio of A/R using the nitrogen removed calculators available on the CDFA FREP website.



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www.esjcoalition.org

The ESJWQC is in the process of developing the appropriate comparisons using information from the member's Farm Evaluation Plans. These data are being linked to the NMP Summary Reports, but it is not clear, a priori, what constitutes similar soils (soils maps can be broken down to either a few soil types or a large number of soil types) or similar practices that will allow for a meaningful comparison of the amount of nitrogen applied, the A/Y ratio, nitrogen removed, and A/R ratio among growers. The ESJWQC is working to develop appropriate "categories of similar practices" that allow identification of growers whose nitrogen removed information can be legitimately compared. The ESJWQC is also developing appropriate comparisons for crops and crop categories for which only one or a few members report nitrogen applied and A/Y. For example, for fig trees in year 2 of growth, only one member reported applied nitrogen and A/Y for 16 acres. The ESJWQC is working to identify an appropriate comparison that will provide the grower with the nitrogen management planning tool that was envisioned when the program was developed.

Once the ESJWQC completes the identification of appropriate categories of similar crops, the remaining analyses can be performed in a relatively straightforward manner. The ESJWQC will be able to submit the remaining data, including A/R ratios for those crops with available N removed calculators, and an accompanying interpretation of the quality of the data by May 30, 2016. As a result, the ESJWQC is requesting an extension to that date.

Submitted respectfully,

A handwritten signature in black ink, appearing to read "Parry Klassen", with a stylized flourish at the end.

Parry Klassen
Executive Director
East San Joaquin Water Quality Coalition

Cc: Sue McConnell, CVRWQCB
Cc: Adam Laputz, CVRWQCB
Cc: Susan Fregien, CVRWQCB
Cc: Ms. Tess Dunham, Esq., Somach Simmons & Dunn
Cc: Michael Johnson, Melissa Turner, MLJ-LLC